

Griffin, Stephanie M.

From: Griffin, Stephanie M.
Sent: Thursday, February 13, 2014 4:10 PM
To: 'Cheryl Mclean'; santiagojuarezlaw@gmail.com; Santiago Juarez
(santiago@santiagojuarezlaw.com)
Cc: Cash, Paul
Subject: RE: Estate of Jerry Perea
Attachments: Initial Disclosure Rules.pdf

Ms. Mclean

I am giving you a one week by which to submit your clients' Initial Disclosures, which include executed medical releases. Per our conversation today, during which I read the local rule to you, Initial Disclosures include the releases, identification of witnesses, identification of exhibits, and disclosure of medical/mental health providers. For your convenience, I am attaching a copy of Rule 26 of the Federal Rules of Civil Procedure and a copy of LRDNM Civ. 26.3 for your reference.

Thank you for your cooperation. I look forward to receiving the Initial Disclosures by February 20th.

Stephanie M. Griffin
Assistant City Attorney
City of Albuquerque Legal Department
Litigation Division
P.O. Box 2248
Albuquerque, NM 87103
(505) 768-4500

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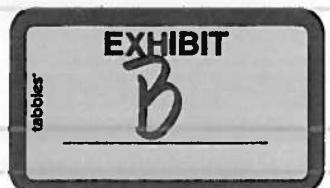
From: Cheryl Mclean [mailto:chrymcln@cs.com]
Sent: Thursday, February 13, 2014 3:32 PM
To: Griffin, Stephanie M.
Subject: Re: Estate of Jerry Perea

Ms. Griffin,

This will confirm our conversation today in which you agree to a one week extension to allow me time to have my client come in and sign the releases and Mr. Juarez time to have his client come in and sign.

Thank you,

Cheryl McLean
914 Lomas Blvd. NW
Albuquerque, NM 87102
505-243-7343



505-243-5265 fax

-----Original Message-----

From: Griffin, Stephanie M. <SGriffin@cabq.gov>
To: santiagojuarezlaw <santiagojuarezlaw@gmail.com>; santiago <santiago@santiagojuarezlaw.com>; chrymcln <chrymcln@cs.com>
Cc: Cash, Paul <pcash@cabq.gov>
Sent: Thu, Feb 13, 2014 1:32 pm
Subject: RE: Estate of Jerry Perea

Mr. Juarez and Ms. McLean

I have not received your clients' Initial Disclosures as requested in my February 7, 2014 letter to you. Consequently, I have drafted the attached motion to compel which I will be filing if I do not receive your Initial Disclosures before 12:00 p.m. on Friday, February 14, 2014.

Stephanie M. Griffin
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From: Griffin, Stephanie M.
Sent: Tuesday, February 11, 2014 6:11 PM
To: 'santiagojuarezlaw@gmail.com'; 'Santiago Juarez (santiago@santiagojuarezlaw.com)'; 'Cheryl Mclean (chrymcln@cs.com)'
Cc: Cash, Paul
Subject: RE: Estate of Jerry Perea

Mr. Juarez and Ms. McLean

Please see the attached letter in regards to scheduling witness depositions.

Stephanie M. Griffin
Assistant City Attorney
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From: Griffin, Stephanie M.
Sent: Friday, February 07, 2014 5:28 PM
To: santiagojuarezlaw@gmail.com; Santiago Juarez (santiago@santiagojuarezlaw.com); Cheryl Mclean

[\(chrvmcin@cs.com\)](mailto:chrvmcin@cs.com)
Cc: Cash, Paul
Subject: Estate of Jerry Perea

Mr. Juarez and Ms. McLean

Please see the attached letter in regards to Plaintiffs' Initial Disclosures and scheduling witness interviews.

Stephanie M. Griffin
Assistant City Attorney
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